UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION, INC., ELSEVIER INC., BEDFORD, FREEMAN & WORTH PUBLISHING GROUP, LLC d/b/a MACMILLAN LEARNING, CENGAGE LEARNING, INC., and MCGRAW HILL LLC,

Civil Action No. 21-cv-3486-RA

Plaintiffs,

v.

DOES 1 - 39 d/b/a ABOOKS.ORG, AIRBOOKS.ORG, AUDIOBOOKSBOOKSHOP.COM, AZ-TESTBANK.COM, BUY-TEST-BANK.ORG, COURSESEXAMS.COM, DOWNLOADAID.COM, EBOOKCLEAR.COM, EASYTAXEXAM.COM, EAZYQUIZ.COM, EDUWORKLAB.COM, FINDTESTBANK.COM, GLORIA-SOLUTION-MANUAL.COM, GROWMYGRADE.COM, HOMEWORKMERIT.COM, ISMTESTBANK.COM, JOYCEBROS.COM, LOVETESTBANK.COM, MAXOOP.COM, NURSINGTB.COM, RESOURCESFORINSTRUCTORS.COM, TEACHINGRESOURCESHUB.COM, SOLUTIONEXAM.COM, STAEQUIZ.COM, TBZUIQE.COM, STUDENTS-CENTER.COM, TEACHINGRESOURCESSTORE.COM, TEST2020BANK.COM, TESTANDSOLUTION.COM, TESTBANKBLOCK.COM, TESTBANKEXAM.COM, TESTBANKRUSH.COM, TESTBANKSCORE.COM, TESTBANKSOLUTIONMANUAL01.COM, TESTBANKSONLINE.COM, TESTBANKSUCCESS.COM, TESTBANKTOWN.COM, TESTBANKWORLD.BLOGSPOT.COM, TESTTHEBANK.COM, THETESTBANK.ORG, TUTORSECTION.COM, and VAROKEE.COM,

Defendants.

PROPOSED AMENDED PRELIMINARY INJUNCTION

Plaintiffs Pearson Education, Inc., Elsevier Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, Cengage Learning, Inc., and McGraw Hill LLC,

(collectively, "Plaintiffs") have moved for the entry of an Amended Preliminary Injunction against Defendants Does 1 - 39,1 doing business as, respectively, abooks.org, airbooks.org, audiobooksbookshop.com, az-testbank.com, buy-test-bank.org, coursesexams.com, ebookclear.com, easytaxexam.com, downloadaid.com, eazyquiz.com, eduworklab.com, gloria-solution-manual.com, growmygrade.com, findtestbank.com, homeworkmerit.com, ismtestbank.com, joycebros.com, lovetestbank.com, maxoop.com, nursingtb.com, resourcesforinstructors.com, teachingresourceshub.com, solutionexam.com, staequiz.com, teachingresourcesstore.com, tbzuige.com, students-center.com, test2020bank.com, testandsolution.com, testbankblock.com, testbankexam.com, testbankrush.com, testbankscore.com, testbanksolutionmanual01.com, testbanksonline.com, testbanksuccess.com, testbankworld.blogspot.com, testthebank.com, testbanktown.com, thetestbank.org, tutorsection.com, and varokee.com, and those additional, currently known websites owned and/or operated by Defendants identified on Appendix A hereto (the "Infringing Sites"), and under the currently known names, aliases, and email addresses identified on **Appendix A** (collectively, "Defendants"). Plaintiffs so move the Court on the basis that Defendants are reproducing, distributing, and selling unauthorized electronic copies of Plaintiffs' copyrighted test banks, instructor solutions manuals ("ISMs"), and/or textbooks, and certain Defendants are using in commerce unauthorized identical or substantially indistinguishable copies of Plaintiffs' federally registered trademarks in connection with the distribution, sale, and/or offering for sale of such infringing materials.

¹ In the same motion in which they moved for the entry of this Amended Preliminary Injunction, Plaintiffs sought leave to file an Amended Complaint. In the proposed Amended Complaint, Plaintiffs name all but two of the Doe Defendants, such that the names and aliases referred to therein (which are included in **Appendix A** hereto) should also be referred to in considering who is a "Defendant" subject to this Order.

The Court, having reviewed the Complaint, the proposed Amended Complaint, the Memorandum of Law in Support of this Amended Preliminary Injunction, the supporting Declaration, and the entire record herein, and having held a hearing on the Order to Show Cause pursuant to which the Court granted Plaintiffs' original request for a Preliminary Injunction on May 19, 2021 (ECF No. 32) ("Original Preliminary Injunction"), makes the following findings of fact and conclusions of law:

- 1. Plaintiffs have served Defendants with the Complaint and the exhibits thereto, the Court's April 22, 2021 Ex Parte Order ("the Ex Parte Order") granting the Application, and the Original Preliminary Injunction. *See* Decl. of Service, ECF Nos. 40-41.
- 2. The Court has personal jurisdiction over Defendants under N.Y. C.P.L.R. § 302(a), including on the grounds that Defendants sell unauthorized copies of Plaintiffs' test banks, ISMs, and/or textbooks through highly interactive websites that are continuously accessible to New York consumers and/or have sold such infringing materials to New York consumers, and Plaintiffs have been injured in New York by Defendants' infringing conduct.
- 3. Plaintiffs are likely to succeed in showing that Defendants have infringed and are continuing to infringe Plaintiffs' federally registered copyrights in connection with Defendants' reproduction, distribution, and/or sale of unauthorized copies of Plaintiffs' test banks, ISMs, and/or textbooks, including via the Infringing Sites. Plaintiffs are also likely to succeed in showing that the Defendants against whom they have asserted trademark infringement claims have infringed and are continuing to infringe Plaintiffs' federally registered trademarks in connection with

- Defendants' reproduction, distribution, sale, and/or offering for sale of unauthorized copies of Plaintiffs' test banks, ISMs, and/or textbooks.
- 4. The reproduction, distribution, sale, and/or offering for sale of the unauthorized copies of Plaintiff's test banks, ISMs, and/or textbooks, and the infringing use of copies of Plaintiffs' trademarks in connection with the distribution, sale, and offering for sale of Plaintiffs' works, will result in immediate and irreparable injury to Plaintiffs if the requested relief is not granted.
- 5. The balance of potential harm to Defendants, if any, by being prevented from continuing to profit from their illegal and infringing activities if the Amended Preliminary Injunction is issued is far outweighed by the harm to Plaintiffs, their businesses, and the value associated with Plaintiffs' copyrights and trademarks if the Amended Preliminary Injunction is not issued. Defendants are not harmed by being prevented from continuing to profit from illegal and infringing activities.
- 6. Public interest favors issuance of the Amended Preliminary Injunction in order to protect Plaintiffs' interest in and to their respective copyrights and trademarks and to protect the public from the harm caused by Defendants' infringing sales, which encourage and facilitate cheating and negatively impact the educational process in the United States.

NOW, THEREFORE, IT IS HEREBY ORDERED, in accordance with Federal Rules of Civil Procedure 64 and 65, the Copyright Act (17 U.S.C. § 502(a)), the Lanham Act (15 U.S.C. § 1116(a)), N.Y. C.P.L.R. §§ 6201 *et al.*, and the Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, that:

1. Defendants, their officers, agents, servants, employees, and attorneys, and all those

in active concert or participation with any of them who receive actual notice of this Amended Preliminary Injunction are enjoined from:

- a) Directly or indirectly infringing any copyrighted work that is owned or exclusively controlled by any of the Plaintiffs ("Plaintiffs' Copyrighted Works"), i.e., any copyrighted work published under any of the imprints identified on Exhibit C to the Complaint and Exhibit D to the proposed Amended Complaint (attached hereto as **Appendix B**) (the "Imprints");
- b) Directly or indirectly infringing any trademark that is owned or exclusively controlled by any of the Plaintiffs ("Plaintiffs' Marks"), including such trademarks associated with the Imprints;
- c) Copying, reproducing, manufacturing, importing, downloading, uploading, transmitting, distributing, selling, offering for sale, advertising, marketing, promoting, or otherwise exploiting any of Plaintiffs' Copyrighted Works without Plaintiffs' express written permission; or enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to engage in such activities;
- d) Copying, reproducing, using in connection with manufacturing, importing, downloading, uploading, transmitting, distributing, selling, offering for sale, advertising, marketing, or promoting goods or services, or otherwise using in commerce, Plaintiffs' Marks without Plaintiffs' express written permission; or enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to engage in such activities;
- e) Using, hosting, operating, maintaining, creating, providing, or registering

any computer server, website, domain name, domain name server, cloud storage, e-commerce platform, online advertising service, social media platform, proxy service (including reverse and forwarding proxies), website optimization service (including website traffic management), caching service, content delivery network, payment processing service, or other service of a similar manner to support the Infringing Sites or otherwise enable, facilitate, permit, assist, solicit, encourage, or induce Defendants' infringement of Plaintiffs' Copyrighted Works or Plaintiffs' Marks;

- f) Transferring ownership or control of the websites, domain names, or accounts associated with Defendants' Infringing Sites; and
- g) Displaying the Infringing Sites in online search results and/or listing links to the Infringing Sites in any search index.
- 2. Defendants, their officers, agents, servants, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Amended Preliminary Injunction, and service providers to Defendants or other third parties who receive actual notice of this Amended Preliminary Injunction and operate or control accounts holding or receiving money or other assets owned by, related to, connected to, associated with, held by, or transferred in connection with Defendants' Infringing Sites or Defendants' sale of Plaintiffs' Copyrighted Works ("Defendants' Accounts"), must immediately locate all of Defendants' Accounts and immediately cease transferring, withdrawing, or otherwise disposing of any money or other assets in Defendants' Accounts or allowing such money or other assets in Defendants' Accounts to be transferred, withdrawn, or otherwise disposed of. Defendants' Accounts include, but are not limited to: (i) Defendants' Accounts with providers of payment processing services

("Payment Processors"), such as PayPal and Stripe; and (ii) Defendants' Accounts with banks,

savings and loan associations, credit card processing agencies, merchant acquiring banks, and

other companies that engage in the processing or transfer of money and/or other assets ("Financial

Institutions"), including but not limited to those accounts listed on **Appendix C** hereto.

IT IS FURTHER ORDERED that Defendants shall preserve copies of all computer files

relating to the Infringing Sites or Defendants' sale of Plaintiffs' Copyrighted Works or use of

Plaintiffs' Marks and shall take all steps necessary to retrieve computer files relating to the same

that may have been deleted before the entry of this Order.

IT IS FURTHER ORDERED that the Expedited Discovery Order contained in the Ex Parte

Order shall remain in effect until further order of the Court.

IT IS FURTHER ORDERED that this Amended Preliminary Injunction replaces and

supersedes the Preliminary Injunction issued on May 19, 2021 (ECF No. 32) and shall remain

in effect until further order of the Court.

It is SO ORDERED this 22 day of November 2021.

Honorable Ronnie Abrams

UNITED STATES DISTRICT JUDGE

APPENDIX A

Doo/Groun	Dofondant(e)	Original Infringing Site(s)	Additional Infringing Site(s)	A line (ne.)	Fmoil Address(es)
Group 1	Mustanha Naiii	easytaxexam.com	buybesttestbank.com	Ataus Samad	admin@easytaxexam.com
1	Zahrat Al Taif d/b/a Goods Wholesalers LL	eduworklab.com	buysmtb.com	James William	admin@eduworklab.com
		test2020bank.com	eduworkhub.com	James Williams	admin@test2020bank.com
			instructortestsolution.com	John Jacob	antorab2010@email.com
			mysmandtb.com	M S Shaikh	biswasku@gmail.com
			smtbhub.com	Prashanta Kumar Baid	emmastewart261@gmail
			smtbstore50.com	Sam Andy	gandjlondonfashion@outlook.com
			studymanage.com	Sarah Williams	instructortestsolution@gmail.com
			thnsm2010.com	Scholaron Utenix Technologies Private Limited	jacobstb02@gmail.com
			testexammaterial.com		jiaryu503@gmail.com
			testsolutionstore.com		iwpp2015@gmail.com
					ms6189782@gmail.com
					mysmandth@mail.com
					najjitraders@omail.com
					najjinadei sæginan. Com
					orderzotacz@gman.com nartho0508@email.com
Group 2	Abderrahmane Lasri	az-testbank.com	buy-solutions-manual.com	A-Z TestBank	A.ZTestBank.Info@gmail.com
•	Ahmed Ali	coursesexams.com	coursemerit.com	Abdul Samad	aatif@flashedcoder.com
	Ali Samy	gloria-solution-manual.com	onlinetestbank.net	Academic Campus LTD	abida.zainab@gmail.com
	Id Tnaine Abdellah	homeworkmerit.com	test-bank-world.com	Ahmed Ishad	ahidairtaza@vahoo.com
	Said Ouakrim	testbankworld blogsnot com	testhank-exams com	Ali	adeel@irtaza.com
	Street Atif Paza	mondescommunications and a second	moorem common and the	A lina Clark	admin@allunese eits
	Syeu Aun Maza			Allild Cidin	dulini@ainidises.site
	Syeu riussam			Ana Aderson	anmedani 199922@nounan.com
				Annie McCauley	aplustbsm(@gmail.com
				Aztestbank	ashelper786@gmail.com
				BaduHost	atif@irtaza.com
				Basma Iyad	atif1286@yahoo.com
				Bibi Nimra	az.testbank.info@gmail.com
				Coursemerit	basma2iyad@hotmail.com
				Courses Exams	bibinimra42@gmail.com
				Cummins Jay	big66804@gmail.com
				Dallas Forsherg	blackcat00006@email.com
				DreamNet	hirrikhalifa127@gmail.com
				Edu-con	contact@webfordesign us
				Eijazulhad U Nizami	coursesexams@gmail.com
				Emerson Torres	coursesexams@vahoo.com
				Fechner I aw	docsmth@hotmail.com
				Fiddak Zahra	expert@haduhost.com
				FlashedCoder	fechnerlaw71@gmail.com
				Frances Coders	flashedcoder0@gmail.com
				Freelance Tutoring	flashedcoder702@ymail.com
				Homework Merit	friendlytutor2002@gmail.com
				Hussain Murad	fullmarkteam@live.com
				Hussain Murad Shipping Services LLC	haadisys@flashedcoder.com
				Hussnain	helpscribd@gmail.com
				Ibex	henryhenry006@gmail.com
				Iffat Zahra	hibaras669@jszmail.com
				Irtaza Hussain	himayes921@smlmail.net
				James Hall	homeworkmerit@gmail.com
				Jessy Ajoke	iffatzahra9@gmail.com
				John Ali	Infoibex0@gmail.com
				John Ferren	jayukemex@emailay.com
_					

Exhibit A

Doe/Group Defendant(s)	Original Infringing Site(s) Additional Infringing Site(s)	Alias(es)	Email Address(es)
		John Sons	jcobharry9312@gmail.com
		Justin Thayer	jincoder2012@gmail.com
		Kinza Ali	jsons6002@gmail.com
		Larry Scott	kitafod@app-mailer.com
		Losoy	kokofi5726@3mailapp.net
		Losoy Bare	lisalee27006@gmail.com
		LTD	losoyubare@3mail.rocks
		LTW	loverlover51214@gmail.com
		LW	majid@tribe361.com
		Nazir Hussain	majidhassan10@hotmail.com
		Nimra	masterji@flashedcoder.com
		Online Education	me@irtaza.com
		Online Homework Market	mekafi@6mail.top
		Phyllis Struck	mohsin@flashedcoder.com
		Rabejak Litwin	mohsinbrolive@gmail.com
		Reza Faheem Ahmad	mohsinraza@irtaza.com
		Robbie Hawkins	mypaypal(@)rrtaza.com
		Salman Ali	noreply@sendowl.com
		Savannah Stiba	numberonetutor2/4@gmail.com
		Sterra Cormey	numberonetutor4 / 2@gman.com
		Sunzan Rose	odanni mileginan.com navment@allfinalexamsanswers.com
		Sudan Nose Sved Irtaza Hussain	payment@ammarexamsanswers.com paypaak@email.com
		Sved Mohsin Raza	pay paak Eman com paypal@flashedcoder.com
		Syed Raza	paypal@isutler.com
		Test Bank	pifaxosa@net2mail.top
		William S	pokaku@8mailpro.com
			project_number@hotmail.com
			project.2215@hotmail.com
			rabejak501@jszmail.com
			raza7867214@gmail.com
			rereho@mail-share.net
			rrazaaza@gmail.com
			sagawi5001@iwebtm.com
			scribd647@gmail.com
			sellfyonwer@gmail.com
			shagusherry@gmail.com
			sierracortneyjenifer87@gmail.com
			Smnllve@gmall.com
			SS LFA I (@nounan.com
			sycan mean grantom syed 27629@mail.com
			syedmohsin raza90@vahoo.com
			svedraza000111@gmail.com
			syedwasif006@gmail.com
			timebusy5@gmail.com
			tvembed@gmail.com
			update.ouakrim1@gmail.com
			vepel32886@quick-mail.cc
			vstream.eu@gmail.com
			waseee(a)tlashedcoder.com
			wasn(@ntaza.com) work20team@amail.com
			WOINZUICALII(@gillall.colli

3					
Doc/Group	Detendant(s)	Original Infringing Site(s)	Additional Infringing Site(s)	Alas(cs)	Email Address(es) world447@gmail.com worldcheater75@yahoo.com wotoc@click2mail.net xvid2014@gmail.com zaviazahid@gmail.com
Group 3	Abida Imran Muhammad Shehzad Qammar Yi Shi	ismtestbank.com	imtestbank.com solutiontestbank.com	Academic eBook ISMTB Istb Jie Chen Mike Jojo Muhammad Rizwan Mustafa Khan OffshoreDedi Testbank UMC	admin@ekinomaniak.tv admin@ismtestbank.com billing@offshorededi.com donaldshi@gmail.com info@offshorededi.com info@offshorededi.com payments@offshorededi.com payments@offshorededi.com service@ismtestbank.com shahzadqamarsgd@gmail.com solutiontestbank@163.com support@offshorededi.com
Group 4	Manh Cuong Can Thu Duc Nguyen	downloadaid.com ebookclear.com testthebank.com		Amena Sharpe Carney Connor Cuong Manh Can Downloadable Solutions Fuong Do John Doe MQV Service MUhammad Junaid Akhtar STV Service TestBankGood Support TND Services TTHT	alijohnny2009@gmail.com chisthieu@hotmail.com connorearney1974@gmail.com dentonanthony1991@gmail.com donna_summer99@yahoo.com downloadablesolutions@hotmail.com maint1607@gmail.com moxi9plus@hotmail.com phaletim56@gmail.com phaletim56@gmail.com starpeamen1990@gmail.com SharpeAmena1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com sharpeamen1990@starali.com support@ebookclear.com support@starakarea.com support@gestankarea.com support@gestankarea.com testbankarea@gmail.com testbankarea@gmail.com
Group 5	Hoa My Hoang Hoang Anh Thi Lan Nguyen Kien Viet Phuc Duong Nguyen Thom Thi Bui Trang Thi Tran Tuan Duong Anh	lovetestbank.com solutionexam.com testbankblock.com testbankexam.com		Ali Mohalin Anh Hoang ATI Student TIP Eoir Aish Fulkerson Clifton Huong Thi Do ibook Files Loan Thi Loan Thi Le Love TestBank LTestbank Moco Wells Retailer Nguyen Thi Khuyen	arthurjohnson920@gmail.com arthurjohnsona2019@gmail.com contact@lovetestbank.com contact@testbankexam.com cukamspoll@gmail.com ellisontoddeb@gmail.com fulkersonclil@addmot.com Fulkersonclil@addmot.com hanh233&@yandex.com hanh3823@gmail.com hanh3823@gmail.com hanh3823@gmail.com

Exhibit A

Doe/Group	Defendant(s)	Original Infringing Site(s)	Additional Infringing Site(s)	Alias(es)	Email Address(es)
	Fricel Maiid	findeschank own	mov nlet-help com	Nguyen Van Chung Phuong Thi Tran Phuong Tran Solution Exam TB Block The Tree TBEXAM Thelak Tokleak TestBank Exam Yen Thi Nguyen	leelandicf471@yandex.com juanetruesdale@gmail.com lovetestbank.com@gmail.com mohalinalixa@gmail.com Mohalinalixa@gmail.com mohamedami 19183@gmail.com nasumspill@gmail.com NasumsPill@gmail.com NasumsPill@gmail.com SeloifCrus@gmail.com solutionexam.com@gmail.com solutionexam.com@gmail.com support@testbankblock.com testbankexam.com@gmail.com testbankexam.com@gmail.com testbankexam.com@gmail.com testbankexam.com@gmail.com testbankexam.com@gmail.com testbankexam.com@gmail.com testbankexam.com@gmail.com testbanktam247@gmail.com testbanktam247@gmail.com tranhaiyen071989@gmail.com tranhaiyen071989@gmail.com
o dinoro	r asal Majid Khalid Ibrahim	Indenstraink.com	center-netp.com center-students.com studytestbank.com	Kasned Al Shobakt Test Bank Solution Manual Testbank Testbank	centertestbank@gmail.com fin-tb@hotmail.com flestbank@mail.com hb_6000@hotmail.com kh-itb@hotmail.com rashed-atb@hotmail.com
Group 7	Abd Rahim Bin Karim Ahma Syahir	тахоор.com		Asad Mahmood Asad Mehmood Daus Enterprise Mian Asad Noor Firdaus Jasmawardi Raka90 Enterprise	abdrahimkarim@outlook.com asadmisc@gmail.com elviprodu@outlook.com firdauswardi.82@outlook.com Support@maxoop.com syahir.osman@outlook.com
Group 8	Alejandro Vera Mohammad Sameed Ubair Khan Abbasi	thetestbank.org	checkouthomeworklance.com courseexam.com Homeworklance.com homeworktimes.com smarthomework-help.blogspot.com testbank-lancer.com ttestbank.net	Abbott Amos Academic Freelancer Academic Reserve Academic Writing Services Custom writing paper Dainel T Brown Dekeisha Lindsey Donald Bailey Donald Bailey Donald Jackman Farhan Sæed Gabriel Dean Gm Media Goods Bay Homeworklance.com, LLC Jeremy Clarke John Smith	Abby654Miller@gmail.com admin@homeworklance.com Allegianx@hotmail.com amin.sohail@rocketmail.com D_gabriel778@hotmail.com daineltbrown@yahoo.com Dean_gabz@hotmail.com donald.jackman@yandex.com farhansaeed23@yahoo.com flip.jupiter@yandex.com Greyortsch@hotmail.com homeworklance@gmail.com homeworklance@yahoo.com homeworklance@yahoo.com homeworklance@yahoo.com homeworklance@yahoo.com homeworklance@yahoo.com homeworklance@gmail.com homeworklance@gmail.com homeworklance@gmail.com

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Doe/Group	Derendant(s)	Original Intringing Site(s)	Additional Infringing Site(s)	Alias(es)	Email Address(es)
				Johnny Guru	I in 1 - 4.432
				Kevin Alfred Lapierre Kevin Sage	Lindseytr423(@gmail.com Madendader51@mail.com
				Nichael Damn	Madendader 51@mail.com
				OIIA Writing Service	michael damn@vandex com
				Ron Ridley	mikelussv@gmail.com
				Sam Outsourcing Media LLC	payment-employer@homeworklance.com
				Sameed Abbasi	payment.tutorialbucket@gmail.com
				SQ Media	payment.uphomework@gmail.com
				Stephen Robert	payment@homeworklance.com
				The Gaming Goat	paymenttutorial@gmail.com
				Tutorial Help	principleshomework@gmail.com
				Writing Services	ronridley4707@gmail.com
					Sameedabbasi1@gmail.com
					sameedsaam@gmail.com
					samoutsourcingmedia@gmail.com
					swissmuch@gmail.com
					tahira.amin(a)yahoo.com
					testbanklancer@gmail.com
					tutorials.homeworkbucket@gmail.com
Group 9	Farah Magsood	eazyquiz.com	acehomework.net	Algobit LTD	444rahamali@gmail.com
•	Muhammad Hamza Afzal	staequiz.com	agradedsolutions.com	BizCave Ltd	aexisharbor09@gmail.com
	Nouman Malik	tbzuige.com	answerbanks.com	Easy Ouiz	alexisharbor09@mail.com
	Syed Hasnain Raza	•	easyquiz.com	James Anderson	ameliorator@hotmail.com
			equizmart.com	Jamshaid Nazar	easyquiz09@gmail.com
			quizsol.com	Mmalik 34	nouman6365@gmail.com
			quizsolutions.online	Quiz Sol	quizsol99@gmail.com
			quizsolutions.site	ReTouch Tech LLC	rockn786@outlook.com
			•	Soul Soothing	shraza81@hotmail.com
				Spinwoop	ssoothing 1@gmail.com
				Tbzuige 100	tbzuiqe@gmail.com
				Tbzuiqe 99	whisperhills@gmail.com
				Zaka uD Dın Bılal	
Group 10	Anjum Akhter	airbooks.org	audiobooksbs.com	ABBS Services	50.tranthisen@mailaze.com
	Dung Vuong	audiobooksbookshop.com	awakebookstore.coom	Abdulsalam Mohamad	abbieclark859572@gmail.com
	Haroon Mansha	varokee.com	blatbooks.com	Akac Garnet	abbyidelle99134@gmail.com
	Nguyen Hai Long		collegestudenttextbook.org	Alvarez Beats	aboutwhom1709@gmail.com
	Nhat Duong Duc		collegestudenttextbooks.com	Amna Rizvi	activitygrave5381@gmail.com
	Sherry Sanders		ctctextbooks.com	Anel Kolenovic	admin@audiobooksbookshop.com
			ctextbooks.com	Aram Buxom	admin@ctctextbooks.com
			duranbooks.com	Atroe	againstrecovery9505@gmail.com
			duranbooks.net	Bastion Sinyari	alanjohnson48e@gmail.com
			egglestonoffice.com	Bien lien Nguyen Bonnio I Bishondoon	alanmason148354@gmail.com
			philidavisocons.com	Bookfit	annannicas 85306/@amail.com
			solutionbank.co	Booknetwor	ameliakelly276870@gmail.com
			zoofs.nl	Bookstore	amnamrizvi@email.com
				Brittany Infinite	andyparker134271@gmail.com
				Brittany Soothing	anjumakhter@gmail.com
				Caliv Cup	annawilliams133020@gmail.com
				Calm Dena	arlyneblaine67743117@gmail.com

Doe/Group Defendant(s)	Original Infringing Site(s) Addit	Additional Infringing Site(s)	Alias(es)	Email Address(es)
			Calvin Polansky	ashleycoo564@gmail.com
			Charie	autumngenna73147341@gmail.com
			Christopher H Revels	bendpalestinian0173@gmail.com
			Christy M Atkins	bergerons 773@gmail.com
			Christy N Varner	cardpayment@enapar.xyz
			Clothes to Kids Inc abbyidelle	cardpayment@popkein.xyz
			College Student Textbooks	cardpayment@sumoug.xyz
			Conroy Pitch	cardsupport@dweear.xyz
			Conroy Sense	charlesallen115194@gmail.com
			CTC Textbooks.com	chrissimpson556617@gmail.com
			Dadourian Arcane	contact@collegestudenttextbooks.com
			Dadourian Pursuit	contact@trouserstv.store
			Dai Viet Nguyen	contact@varokee.com
			Dang Van Tu	coorismartin8990@gmail.com
			David W. Mann	cothrarichards7098@gmail.com
			Debbie K Rickman	countyunlike2264@gmail.com
			Deborah J Vineyard	coxardsaunnd9555@gmail.com
			Deweear	craigrogers886032@gmail.com
			Digital Bks	dalelloyd703777@gmail.com
			Dong Duy Nguyen	danbrown223499@gmail.com
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			Duc Manh Pham	danielleknight489630@gmail.com
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					support@solidtechdev.com
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Exhibit A

APPENDIX B

Plaintiffs' Imprints

Cengage Learning	Macmillan Learning	
Brooks Cole	Bedford, Freeman & Worth High School	
Cengage	Publishers	
Cengage Learning	Bedford/St. Martin's	
Course Technology	BFW	
Delmar	BFW High School Publishers	
Gale	Freeman	
Heinle	Macmillan Learning	
Milady	W.H. Freeman & Company	
National Geographic Learning	Worth	
South-Western Educational Publishing	Worth Publishers	
Wadsworth		
]	Elsevier	
Academic Cell	Medicine Publishing	
Academic Press	Morgan Kaufmann Publishers	
Amirsys	Mosby	
Butterworth Heinemann	Newnes	
Digital Press	North Holland	
Elsevier	Saunders	
Gulf Professional Publishing	Urban & Fischer	
Hanley & Belfus	William Andrew	
Knovel	Woodhead Publishing	
Made Simple Books	Pearson	
McGraw Hill	Pearson	
Irwin	Addison Wesley	
Lange	Adobe Press	
McGraw-Hill	Allyn & Bacon	
McGraw-Hill Education	Benjamin Cummings	
McGraw-Hill Higher Education	Brady	
McGraw-Hill Professional	Cisco Press	
McGraw-Hill Ryerson	Financial Times Press/FT Press	
McGraw-Hill/Appleton & Lange	IBM Press	
McGraw-Hill/Contemporary	Longman	
McGraw-Hill/Dushkin	New Riders Press	
McGraw-Hill/Irwin	Peachpit Press	
McGraw Hill	Pearson	
NTC/Contemporary	Pearson Education	
Osborne	Que Publishing	
Schaum's	Sams Publishing	

APPENDIX C (REDACTED)

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 22 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 1	Payoneer	4253
Group 1	PayPal	6483
Group 2	Attijariwafa Bank	6647
Group 2	Bank of America	6771
Group 2	Bank of America	2452
Group 2	Community Federal Savings Bank	4207
Group 2	DirectCash Bank	5215
Group 2	Evolve Bank & Trust	5050
Group 2	First Century Bank, N.A.	7669
Group 2	First Century Bank, N.A.	3446
Group 2	First Century Bank, N.A.	2193
Group 2	Habib Bank	4411
Group 2	MetaBank	6169
Group 2	MetaBank	5504
Group 2	National Australia Bank	0789
Group 2	Payoneer	9179
Group 2	Payoneer	9740
Group 2	PayPal	4077
Group 2	PayPal	0178
Group 2	PayPal	1526
Group 2	PayPal	2884
Group 2	PayPal	9186
Group 2	PayPal	9292
Group 2	PayPal	5249
Group 2	PayPal	8261
Group 2	PayPal	5717
Group 2	PayPal	7764
Group 2	PayPal	7667
Group 2	PayPal	8757
Group 2	Paypal	4169
Group 2	Paypal	4131
Group 2	PayPal	4565
Group 2	Paypal	2376
Group 2	Paypal	0282
Group 2	Paypal	8772
Group 2	PayPal	0122
Group 2	PayPal	3443
Group 2	PayPal	6124
Group 2	PayPal	5750
Group 2	PayPal	0879
Group 2	Paypal	6651
Group 2	PayPal	4469
Group 2 Group 2	PayPal PayPal	4469
Group 2 Group 2	PayPal PayPal	6155
Group 2 Group 2	Paypal Paypal	0758
	PayPal	2494
Group 2 Group 2	PayPal PayPal	3766
Group 2	PayPal	1563
Group 2	PayPal	0281
Group 2	PayPal	2175
Group 2	PayPal	6723
Group 2	PayPal	2150
Group 2	Paypal	3095

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 23 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 2	Paypal	9012
Group 2	Stripe	Yuef
Group 2	Stripe	s1HL
Group 2	Stripe	F4bX
Group 2	Stripe	aXDD
Group 2	Stripe	x3EZ
Group 3	Capital One	6497
Group 3	CitiBank Federal Savings Bank	7197
Group 3	CitiBank Federal Savings Bank	2565
Group 3	PayPal	2453
Group 3	PayPal	3138
Group 3	PayPal	1462
Group 3	PayPal	6313
Group 3	PayPal	9190
Group 3	Stripe	MOdU
Group 3	Stripe	ZZV7
Group 3	Stripe	bnhc
Group 3	Stripe	kSSJ
Group 4	PayPal	6799
Group 4	PayPal	1916
Group 4	PayPal	1585
Group 4	PayPal	5677
Group 4	PayPal	2417
Group 4	PayPal	7854
Group 5	Paypal	3201
Group 5	Paypal	3812
Group 5	Paypal	4910
Group 5	Paypal	6807
Group 5	PayPal	4336
Group 5	PayPal	3647
Group 5	PayPal	4879
Group 5	PayPal	9875
Group 5	PayPal	8534
Group 5	PayPal	2477
Group 5	PayPal	1215
Group 5	PayPal	9606
Group 6	PayPal	4628
Group 6	PayPal	5138
Group 7	CIMB	5960
Group 7	Paypal	7308
Group 7	PayPal	1056
Group 7	PayPal	0267
Group 7	PayPal	6291
Group 7	RHB	9393
Group 8	Bank of America	9655
Group 8	Bank of America	5592
Group 8	Discover Bank	1349
Group 8	E Trade Bank	7120
Group 8	First Century Bank, N.A.	5626
Group 8	First Century Bank, N.A. First Century Bank, N.A.	3655
Group 8	First Century Bank, N.A. First Century Bank, N.A.	0477
Group 8	First Century Bank, N.A. First Century Bank, N.A.	7326
	First Century Bank, N.A. First Century Bank, N.A.	7326
Group 8		

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 24 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 8	GMAC Bank	9433
Group 8	Goldman Sachs Bank US	1328
Group 8	PayPal	0689
Group 8	PayPal	4461
Group 8	PayPal	2236
Group 8	PayPal	1158
Group 8	PayPal	8976
Group 8	PayPal	7295
Group 8	PayPal	6874
Group 8	PayPal	8342
Group 8	PayPal	0389
Group 8	PayPal	5307
Group 8	PayPal	8224
Group 8	PayPal	6638
Group 8	PayPal	2272
Group 8	PayPal	1378
Group 8	PayPal	6390
Group 8	PayPal	7209
Group 8	PayPal	8389
Group 8	PayPal	5999
Group 8	PayPal	3111
Group 8	PayPal	6668
Group 8	Pentagon Federal Credit Union	4011
Group 8	Stride Bank	9368
Group 8	Stride Bank	1082
Group 8	Suntrust	4600
Group 9	Bank of Lithuania	6270
Group 9	Caixa Bank, S.A.	5543
Group 9	Community Federal Savings Bank	0210
Group 9	Community Federal Savings Bank Community Federal Savings Bank	6263
Group 9	Community Federal Savings Bank	1324
Group 9	Evolve Bank & Trust	3390
Group 9	Handels Bank	1689
Group 9	Mini Bank	2787
Group 9	Mini Bank	3119
Group 9	Mini Bank	3818
Group 9	Mini Bank	2796
Group 9	Payoneer	8648
Group 9 Group 9	Payoneer	8686
•	Payoneer	8562
Group 9	PayPal	7723
Group 9	·	
Group 9	PayPal	6268
Group 9	Paypal	5720
Group 9	PayPal	4793
Group 9	PKO	4269
Group 9	Stripe	OT1U
Group 9	Stripe	MN1b
Group 9	TransferWise	0230
Group 9	TransferWise	0740
Group 9	TransferWise	2796
Group 10	198 Tran Quang Khai	9353
Group 10	Abn Amro Bank N.V.	8528
Group 10	American Express National Bank	4956
Group 10	American Express National Bank	6162

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 25 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 10	Asia Commercial Bank	7339
Group 10	CitiBank NA	5528
Group 10	Community Bank and Trust	1939
Group 10	Community Federal Savings Bank	5877
Group 10	First Century Bank, N.A.	7997
Group 10	First Century Bank, N.A.	5647
Group 10	First Century Bank, N.A.	4813
Group 10	First Century Bank, N.A.	9295
Group 10	First Century Bank, N.A.	6403
Group 10	First Century Bank, N.A.	6409
Group 10	First Century Bank, N.A.	9289
Group 10	First Century Bank, N.A.	4645
Group 10	First Century Bank, N.A.	6402
Group 10	First Century Bank, N.A.	0088
Group 10	First Century Bank, N.A.	6401
Group 10	First Century Bank, N.A.	1968
Group 10	First Century Bank, N.A.	6405
Group 10	First Century Bank, N.A.	7801
Group 10	First Century Bank, N.A.	1967
Group 10	First Century Bank, N.A.	7800
Group 10	First Century Bank, N.A.	5892
Group 10	Halifax Bank	1260
Group 10	Ing Bank N.V.	1124
Group 10	Payoneer	7009
Group 10	Payoneer	1959
Group 10	Payoneer	4136
Group 10	Payoneer	6763
Group 10	Payoneer	1518
Group 10	Payoneer	1809
Group 10	PayPal	4083
Group 10	PayPal	2843
Group 10	PayPal	5603
Group 10	PayPal	3571
Group 10	PayPal	8694
Group 10	PayPal	1221
Group 10	PayPal	6449
Group 10	PayPal	3528
Group 10	PayPal	4534
Group 10	PayPal	8471
Group 10	PayPal	0735
Group 10	PayPal	4918
Group 10	PayPal	0027
Group 10	PayPal	3567
Group 10	PayPal	4968
Group 10	PayPal	7737
Group 10	PayPal	7350
Group 10	PayPal	9985
Group 10	PayPal	5253
Group 10 Group 10	PayPal	2008
Group 10 Group 10	PayPal	6147
Group 10	PayPal	2568
Group 10	PayPal	1641
Group 10 Group 10	PayPal	7405
_		8364
Group 10	PayPal	8304

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 26 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 10	PayPal	0335
Group 10	PayPal	1625
Group 10	PayPal	2784
Group 10	PayPal	2900
Group 10	PayPal	4251
Group 10	PayPal	1009
Group 10	PayPal	6985
Group 10	PayPal	7913
Group 10	PayPal	3815
Group 10	PayPal	0890
Group 10	PayPal	8113
Group 10	PayPal	0392
Group 10	PayPal	2307
Group 10	PayPal	5851
Group 10	PayPal	5613
Group 10	PayPal	7133
Group 10	PayPal	9570
Group 10	PayPal	4617
Group 10	PayPal	6262
Group 10	PayPal	7481
Group 10	PayPal	1796
Group 10	PayPal	4564
Group 10	PayPal	8401
Group 10	PayPal	4184
Group 10	PayPal	0331
Group 10	PayPal	9946
Group 10	PayPal	5904
Group 10	PayPal	5551
Group 10	PayPal	2614
Group 10	PayPal	0216
Group 10	PayPal	4479
Group 10	PayPal	9747
Group 10	PayPal	4941
Group 10	Paypal	5700
Group 10	PayPal	7171
Group 10	PayPal	6156
Group 10	PayPal	2082
Group 10	PayPal	9069
Group 10	PayPal	8238
Group 10	PayPal	1278
Group 10	PayPal	8109
Group 10	PayPal	5339
Group 10	PayPal	7691
Group 10	PayPal	3951
Group 10	PayPal	8917
Group 10	PayPal	1021
Group 10	PayPal	4110
Group 10	PayPal	0224
Group 10	PayPal	8644
Group 10	PayPal	6346
Group 10	PayPal	2922
Group 10	PayPal	9145
Group 10	PayPal	9051
Group 10	PayPal	9715

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 27 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 10	PayPal	6392
Group 10	PayPal	0561
Group 10	PayPal	5175
Group 10	PayPal	7725
Group 10	PayPal	2819
Group 10	PayPal	5519
Group 10	PayPal	0560
Group 10	PayPal	1664
Group 10	PayPal	4902
Group 10	PayPal	1858
Group 10	PayPal	7193
Group 10	PayPal	8710
Group 10	PayPal	3213
Group 10	PayPal	9503
Group 10	PayPal	9200
Group 10	PayPal	5079
Group 10	PayPal	2159
Group 10	PayPal	1820
Group 10	PayPal	0845
Group 10	PayPal	3991
Group 10	PayPal	2500
Group 10	PayPal	3439
Group 10	PayPal	9368
Group 10	PayPal	6615
Group 10	PayPal	9711
Group 10	PayPal	5448
Group 10	PayPal	7342
Group 10	PayPal	3146
Group 10	PayPal	4781
Group 10	PayPal	9439
Group 10	PayPal	9435
Group 10	PayPal	0226
Group 10	PayPal	1916
Group 10	PayPal	7720
Group 10	PayPal	3334
Group 10	PayPal	4097
Group 10	PayPal	8231
Group 10	PayPal	1519
Group 10	PayPal	7792
Group 10	PayPal	1583
Group 10	PayPal	2216
Group 10	PayPal	3726
Group 10	PayPal	2456
Group 10	PayPal	6494
Group 10	PayPal	8764
Group 10	PayPal	6899
Group 10	PayPal	7738
Group 10	PayPal	6841
Group 10	PayPal	7620
Group 10	PayPal	2931
Group 10	PayPal	4950
Group 10	PayPal	2654
Group 10	PayPal	8453
Group 10	PayPal	3595

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 28 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Group 10	PayPal	5284
Group 10	PayPal	9403
Group 10	PayPal	4413
Group 10	PayPal	6412
Group 10	PayPal	5776
Group 10	PayPal	6055
Group 10	PayPal	2352
Group 10	PayPal	7247
Group 10	PayPal	5230
Group 10	PayPal	8223
Group 10	PayPal	9574
Group 10	PayPal	4152
Group 10	PayPal	3414
Group 10	PayPal	0143
Group 10	PayPal	4385
Group 10	PayPal	6456
Group 10	PayPal	5267
Group 10	South East Asia Commercial Joint Stock Bank	5888
Group 10	Stripe	Jsus
Group 10	Stripe	uas5
Group 10	Stripe	5pQY
Group 10	Stripe	UJox
Group 10	Stripe	eRZc
Group 10	Stripe	WTYy
Group 10	Stripe	yETt
Group 10	Stripe	B3G9
Group 10	Stripe	qH0m
Group 10	Stripe	S4FB
Group 10	Stripe	nIoE
Group 10	Stripe	qjPl
Group 10	Stripe	Ii76
Group 10	Stripe	SIXV
Group 10	Stripe	q2c1
Group 10	Stripe	HKht
Group 10	Stripe	ypkz
Group 10	Stripe	SAgN
Group 10	Stripe	w83F
Group 10	Stripe	qIRO
Group 10	Stripe	hoLt
Group 10	Stripe	jW2M
Group 10	Stripe	TkSJ
Group 10	Stripe	HIFS
Group 10	Stripe	9Ztq
Group 10	Stripe	JrXb
Group 10	Tienphong Commercial Joint Stock Bank	6001
Group 10	Vietnam Joint Stock Commercial Bank for Industry and Trade	5888
Group 10	Vietnam Joint Stock Commercial Bank for Industry and Trade	9072
Group 10	Vietnam Technological and Commercial Joint Stock Bank	9666
Group 10	Vietnam Technological and Commercial Joint Stock Bank	6003
Group 10	Wells Fargo Bank NA	7651
Kien Quyet Tran	PayPal	7824
Kien Quyet Tran	PayPal	3522
Kien Quyet Tran	PayPal	5578
Kien Quyet Tran	PayPal	3532

Case 1:21-cv-03486-RA Document 56 Filed 11/22/21 Page 29 of 29 Bank and Payment Processor Accounts

Group/Doe	Bank/Payment Processor	Account Number Redacted
Farouq Jabri	PayPal	2562
Farouq Jabri	PayPal	0598
Farouq Jabri	PayPal	9453
Ramya Mani	ICICI Bank Chennai-Porur Branch	7819
Ramya Mani	ICICI BANK LIMITED	5317
Ramya Mani	ICICI BANK LIMITED	6376
Ramya Mani	Paypal	9400
Ramya Mani	Stripe	RmgG
Henry Johnson	Onpoint Community Credit Union	3914
Henry Johnson	Stripe	gDem
Henry Johnson	Wells Fargo Bank NA	1897
Huong Thi Thu Nguyen	PayPal	7102
Huong Thi Thu Nguyen	Paypal	8978
Mike Wallace	Bank of America	2794
Mike Wallace	First Century Bank, N.A.	2763
Mike Wallace	PayPal	3270
Mike Wallace	Stripe	LvAr
Mike Wallace	Stripe	2ttL
An Nguyen Hoang Thien	Paypal	6100
An Nguyen Hoang Thien	PayPal	7277
An Nguyen Hoang Thien	PayPal	2318
An Nguyen Hoang Thien	PayPal	3494
An Nguyen Hoang Thien	PayPal	8961
An Nguyen Hoang Thien	PayPal	1936
Jongho Ku	Paypal	1992
Jongho Ku	PayPal	9756
Jongho Ku	Stride Bank	3506